

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

RODNEY BECKWITH IV,

Plaintiff,

v.

FORD MOTOR COMPANY, a
Delaware Corporation,

Defendant.

Case No. 2:22-cv-12641

Hon. Gershwin A. Drain

Mag. Judge Elizabeth A. Stafford

STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT

The undersigned counsel of record for Plaintiff Rodney Beckwith IV (“Plaintiff”) and Defendant Ford Motor Company (“Defendant”) stipulate and agree to extend the time for Defendant to respond to Plaintiff’s Complaint as follows:

WHEREAS Plaintiff filed her Complaint on November 2, 2022;

WHEREAS Counsel for Defendant emailed Counsel for Plaintiff on November 4, 2022, offering to waive service of a summons in exchange for a 60-day responsive pleading deadline, and Counsel for Plaintiff agreed and sent Counsel for Defendant a waiver of service form on November 7, 2022;

WHEREAS, on the same day, November 7, 2022, Defendant's Statutory Agent, CT Corporation, received a service copy of the Complaint and Summons by traceable mail postmarked on November 2, 2022;

WHEREAS Plaintiff and Defendant agree that the time for Defendant to respond to the Complaint shall be extended up to and including January 6, 2023;

WHEREAS the requested extension is intended by the Parties to afford Defendant sufficient time to investigate and respond to the allegations in Plaintiff's Complaint;

WHEREAS the Parties have not agreed to any prior extensions of time in this action, and the Parties agree that this stipulation does not waive any right of the Parties to stipulate to further extensions; and

WHEREAS counsel for Plaintiff and Defendant have consented in writing to this extension;

IT IS STIPULATED AND AGREED THAT Defendant shall have up to and including January 6, 2023, to answer or otherwise respond to Plaintiff's Complaint. Nothing in this Stipulation shall be construed as a waiver of any of Plaintiff's or Defendant's rights, defenses, or arguments they would otherwise have.

Dated: November 17, 2022

GIBSON, DUNN & CRUTCHER LLP

/s/ Jesenka Mrdjenovic

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Attorneys for Defendant

Dated: November 17, 2022

**PITT, MCGEHEE, PALMER,
BONANNI & RIVERS P.C.**

/s/ Channing E. Robinson-Holmes (w/
permission)

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Attorney for Plaintiff Rodney Beckwith IV

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ORDER EXTENDING TIME TO RESPOND TO COMPLAINT

Upon stipulation of the Parties, by and through their respective counsel;

IT IS HEREBY ORDERED that Defendant Ford Motor Company shall
respond to Plaintiff's Complaint on or before January 6, 2023.

IT IS SO ORDERED.

Dated: November 21, 2022

s/Gershwin A. Drain
GERSHWIN A. DRAIN
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2022, I caused the foregoing document to be electronically filed with the Clerk of the Court using the ECF system, which will send notification of such filing to all attorneys of record.

/s/ Jesenka Mrdjenovic
Attorney for Defendant

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